

# **EXHIBIT C**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA

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UNITED STATES SECURITIES AND )  
EXCHANGE COMMISSION, )  
Plaintiff, )  
 ) CIVIL ACTION  
V. ) No. 11-cv-00723-ADM-JSM  
 )  
MARLON QUAN; ACORN CAPITAL )  
GROUP, LLC; STEWARDSHIP )  
INVESTMENT ADVISORS, LLC; )  
STEWARDSHIP CREDIT ARBITRAGE )  
FUND, LLC; PUTNAM GREEN, LLC; )  
LIVINGSTON ACRES, LLC; and )  
ACG II, LLC, )  
Defendants. )  
 )  
FLORENE QUAN, )  
Relief Defendant, )  
 )  
-and- )  
 )  
DZ BANK, AG DEUTSCHE ZENTRAL- )  
GENOSSENSCHAFTSBANK, FRANKFURT )  
AM MAIN ("DZ BANK"), )  
Intervenor. )  
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DEPOSITION OF STANLEY P. FISHKIN  
November 27, 2012  
10:21 AM

1 colleges.

2 Q. And what was the last date of your involvement  
3 in Stewardship Foundation?

4 A. A couple years ago.

5 Q. Okay. And we talked earlier about Brighter  
6 Planet. What is Brighter Planet?

7 A. Brighter Planet is a start-up that's winding  
8 up -- winding down, winding up. Bank America was its  
9 issuing bank, and unfortunately, Lehman went down, the  
10 world fell apart, and while it's been a successful  
11 investment in the sense that we're getting about half  
12 the money back, it's -- can't go anywhere.

13 Q. And what was it? It was a credit card --

14 A. Credit card.

15 Q. Credit card?

16 A. Yup.

17 Q. And what was the thesis on how it would  
18 generate money?

19 A. The thesis was that it would attract people  
20 that were concerned about the environment and for every  
21 dollar they spent, they would get environmental points,  
22 and then they would buy credits and retire them. So it  
23 was a nice idea. A credit card didn't work really from  
24 the beginning. The debit card was really very  
25 successful, but they proved to be not much of a partner

1 when they were falling apart.

2 Q. And you solicited investments -- or you  
3 solicited Mr. Quan to be an investor in Brighter --

4 A. He wanted to know if I had anything that he  
5 could do.

6 Q. Okay. And you're aware that Mr. Quan invested  
7 \$250,000 in --

8 A. 250.

9 Q. Okay. Do you know what the status of that  
10 investment is now?

11 A. He'll probably get back a hundred and a  
12 quarter.

13 Q. Approximately when?

14 A. It will be two payments. The first payment  
15 will be early in '13. The second payment will be when  
16 we receive our last payment from the bank, which will  
17 probably be the end of the third quarter.

18 Q. Okay. What is Worth Mountain?

19 A. Worth Mountain is a company that no longer  
20 exists. It was a holding company for the leveraged  
21 buyout of a company in the Northeast Kingdom of Vermont  
22 called NSA Industries. Worth Mountain has been folded  
23 into NSA Industries, and NSA Industries is a profitable  
24 company that is in the machine shop business. It does  
25 about 40 million a year and is growing.